

PRODUCT PERFORMANCE / EFFICACY REVIEW

Mark Suarez, Entomologist - IB

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16 July 2008

DATE: 16 July 2008

EPA REG. NUMBER: 279-3206

PRODUCT NAME: Talstar TC Flowable ~~Termiticide~~/insecticide
REGISTRANT: FMC Corp. Agricultural Products Group

PM: George LaRocca, PM13
REVIEWER: BeWanda Alexander

DECISION #.: 390482
DP BARCODE: 350355
ACTION: R340

ACTIVE INGREDIENT(S): 128825, Bifenthrin.....7.9%

TYPE: Liquid Concentrate

OPPTS GUIDELINE(S): 810.3500

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|--------------|----------|-----------|----------|
| MRID: | 47363201 | Submitted | GLP? No. |
| | 47020401 | Cited | GLP? No. |

SITES: Indoors
PESTS: BedBugs

ENTOMOLOGIST'S COMMENTS AND RECOMMENDATIONS:

In the 18 May 2007 review of MRID 47020401 by Kevin Sweeney the following details were omitted from the study:

1. The volume of product applied to each panel
2. The treatment expressed in terms of mg bifenthrin/cm²
3. The size of the test panels and swatches of cotton

It was recommended that the label be modified in the following ways:

1. More clearly express the equation to calculate the percent active ingredient in the end use solution
2. Clearly state the application rate in gallons per 1000 ft²
3. Revise the dilution rate for use against bed bugs to 0.06%

The registrant has responded to the study deficiencies by providing MRID 47363201, in which the missing study details were provided.

1. The panels were treated with 1.2 ml product each.
2. The tiles received 0.0015 mg bifenthrin/cm² (300 ppm) or 0.0031 mg bifenthrin/cm² (600 ppm).
3. Test panels and cotton swatches were both 6" x 6".

The label issues have not been fully resolved.

1. The label deficiency relating to the calculation of percent active ingredient has been fully addressed.
2. The application rate is not provided for bed bugs indoors (p. 5), but is for Food/Feed Handling Establishments (p. 6). Indicate in both locations that the application rate is 0.06% dilution applied at a rate of 1 gallon per 1000 ft².
3. The original efficacy review indicated that a 0.06% dilution is appropriate for bed bug control due to poor performance on non-porous surfaces. Revise the label directions for use for bedbugs to indicate that a 0.06% dilution is to be used.

The changes proposed to the termiticide section of the label in the 29 February 2008 letter are acceptable. No other modifications were noted.